

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF MOTION TO COMPEL
MATERIALS IN THE POSSESSION OF THIRD PARTY VALISURE LLC**

PLEASE TAKE NOTICE that on February 6, 2023, or as soon thereafter as counsel may be heard, defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare US, LLC (collectively, “the ZHP Defendants”), shall move for an entry of Order compelling third party Valisure LLC to provide information responsive to ZHP’s subpoena of December 14, 2022.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter and the Certification of Jessica Davidson Miller, Esq. together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: January 4, 2023

Respectfully submitted,

By: /s/ Jessica Davidson Miller

Jessica Davidson Miller (DC Bar No.
457021)

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Defendants*

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Pharmaceutical Co., Ltd., Huahai U.S., Inc.,

Princeton Pharmaceutical Inc., and Solco

Healthcare U.S., LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 4, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson Miller

Jessica Davidson Miller (DC Bar No.
457021)